

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHAEL WATSON, INDIVIDUALLY,
AND AS FATHER AND NEXT FRIEND OF
JOHN WATSON,

Plaintiff,

v.

HUSQVARNA PROFESSIONAL
OUTDOOR PRODUCTS, INC.,
Defendant.

CIVIL ACTION
NO: 04-11782DPW

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

The Plaintiff respectfully request that the following voir dire questions be put to the jury during the impanelment process:

1. Have any of you, by virtue of his or her prior service on a jury, developed any opinions or attitudes or beliefs which would make it difficult for you to be completely fair and impartial in this personal injury case?
2. Do any of you have any opinions, attitudes or beliefs which would prevent you from awarding damages that are fully commensurate with the injuries proved, even though that may mean returning a verdict for a large sum of money?
3. There will be testimony by an expert mechanical engineer and medical doctor in this case. Do any of you have any opinions, attitudes or beliefs which would prevent you from being completely fair and impartial in your acceptance of expert scientific or medical testimony?
4. The Plaintiff is seeking damages for personal injuries allegedly caused by the actions of the Defendant. Is there any reason that any of you have, at this time, already formed any belief that the Plaintiff is not entitled to be compensated?
5. Have any of you ever read or heard anything about personal injury law suits which would, for any reason, prevent you from being fair and impartial to either side, or would prevent you from reaching a verdict based upon the law and the evidence before you?

6. Have any of you formed an opinion or belief that there are too many law suits in today's society?
7. Would any of you be unable or unwilling to impose liability on a manufacturer of power tools?
8. Do any of you regularly use electric power tools in connection with your employment?
9. Do any of you own or regularly work with power tools manufactured by Partner or Husqvarna?
10. Have any of you ever sustained an injury from a power tool?

Respectfully submitted
The Plaintiff
By his attorneys,

/s/ Jonathan E. Tobin
Jonathan E. Tobin (641509)
Thomas Drechsler (134840)
BYRNE & DRECHSLER, LLP
50 Redfield St.
Boston, MA 02122
617-265-3900

CERTIFICATE OF SERVICE

I, Jonathan E. Tobin, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copied will be sent to those indicated as non-registered participants on February 21, 2007.

/s/ Jonathan E. Tobin
Jonathan E. Tobin